



May 18th, 2022

C. Jo Anne Wessinger Hill, Esq.
General Counsel to the Commission
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Final Written Conflicts Check for Docket Nos. 2023-15-E, 2023-16-E, and 2023-17-E

Dear Ms. Wessinger Hill:

We have conducted a final conflicts check, and can confirm that there are no actual or potential conflicts of interest for London Economics International LLC ("LEI") in performing the contractual obligations contemplated by the Public Service Commission of South Carolina in the above-referenced dockets. As the list of intervening parties has yet to be finalized for Docket Nos. 2023-15-E, 2023-16-E, and 2023-17-E, LEI has conducted this final conflicts check based on the parties involved in the three 2021 avoided cost cases (Docket Nos. 2021-88-E, 2021-89-E, and 2021-90-E). LEI is not currently working for any of these parties, or any of their subsidiaries, affiliates, or members.

LEI was retained by the following entities in previous engagements. However, these past relationships do not represent conflicts in the current proceedings. Only the Public Utilities Commission of Ohio ("PUCO") engagement is ongoing.

- LEI was engaged by PUCO in April 2020 to perform an audit of the price stabilization rider ("PSR") of Duke Energy Ohio for the output of two coal plants operated by the Ohio Valley Electric Corporation ("OVEC"). As part of the engagement, LEI: (i) examined fuel and variable cost expenditures and capital expenditures to determine whether they were prudently incurred; (ii) compared and benchmarked costs and other operational results against data from public sources; and (iii) examined and benchmarked power plant performance. LEI is engaged to perform similar work again commencing in July 2021, when the firm was contracted by PUCO to perform an audit of the prudence and performance of the generation purchase riders of Duke Energy Ohio, AEP Ohio, and AES Ohio for the output of the two coal plants operated by OVEC;¹
- LEI was engaged by Cypress Creek Renewables, a member of the Carolinas Clean Energy Business Association ("CCEBA"), in July 2017 to develop energy price outlooks for several ERCOT zones;
- LEI was engaged by EDF Renewables (a member of CCEBA) in January 2016 to deliver forecast wholesale energy prices across the WECC region;

¹ LEI includes these engagements in response to a question raised by the Commission during the firm's May 16th, 2022 public interview, specifically requesting declaration of previous work LEI has done for state or Federal regulatory agencies involving oversight of Duke Energy Carolinas, Duke Energy Progress, Dominion Energy, or any of their affiliates. These engagements have no impact on LEI's independence in proceedings in South Carolina.

- LEI was engaged by NextEra Energy Resources (a member of CCEBA) in June 2013 to identify target countries for clean power development in the Caribbean and selected Latin American countries;
- LEI was engaged by First Solar (a member of CCEBA) in September 2012 to evaluate utility-scale solar PV power development projects in Central America, and again in August 2013 to evaluate utility-scale solar PV power development projects in Mexico; and
- LEI was engaged by Virginia Power (an affiliate of Dominion Energy) in March 1998 to provide a comprehensive strategy review of responses to deregulation.

If you have any follow-up requests or questions, please do not hesitate to reach out to me at the contact information below.

Sincerely,

A handwritten signature in black ink, appearing to read 'AJ Goulding', with a stylized flourish at the end.

AJ Goulding
President
ajg@londoneconomics.com